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REMARKS

The Office Action dated July 25, 2005, has been received and carefully considered. Claims 1 and 24 have been amended. Claims 42 and 43 have been added. Support for the new claims and the amended claims may be found in the specification as filed. Reconsideration of the outstanding rejections in the present application is respectfully requested based on the following remarks.

Anticipation Rejection of Claims 1-6, 8, 10-21, 23-32, and 34

At page 2 of the Office Action, claims 1-6, 8, 10-21, 23-32, and 34 were rejected under 35 U.S.C. Section 102(e) as being anticipated by MacInnis (U.S. Patent No. 6,570,579). This rejection is hereby respectfully traversed.

Claim 1 recites "routing each of the one or more data access requests from the router to a corresponding memory controller of the plurality of memory controllers based on the configuration data and based on the tag associated with each of the one or more data access requests." This element is not disclosed or suggested by MacInnis. MacInnis discloses a dual memory system including a memory select block. As stated on page 2 of the Office Action, "The memory select block 1100 (a router) preferably routes the memory requests to a first arbiter 1102 or to a second arbiter 1106 *based on the address of the requested memory*" (emphasis added). Thus, the element of MacInnis identified as the router by the Office Action does not route data access requests based on configuration data, but instead routes requests based on a memory address. Further, MacInnis does not route a data access request based on a tag associated with the request.

The Office Action indicates that configuration data is "inherently included" in MacInnis "to identify which memory controller will support the requesting client. *Office Action*, p. 3. However, there is no disclosure or suggestion in MacInnis that data access requests are routed based on anything other than a memory address. Moreover, there is no disclosure or suggestion in MacInnis that there is any data that indicates, for each of a plurality of clients, which memory controller of a plurality of memory controllers will support the client as recited by claim 1. Accordingly, MacInnis fails to disclose or suggest each and every element of claim 1.

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Claims 2-6, 8, 10-21, 23 and 42-43 depend from claim 1. Accordingly, MacInnis fails to disclose or suggest each and every element of these claims, at least by virtue of their dependency on claim 1. Moreover, these claims recite additional non-obvious features.

With respect to claim 24, the claim as amended recites:

a router having a plurality of first input ports coupled to the data access port of each of the plurality of clients, a second input port coupled to the output port of the storage module, a first plurality of output ports, and a second plurality of output ports, wherein the router is to route data at each one of the plurality of first input ports to a respective output port of the first or second plurality of output ports based upon the configuration data stored in the storage module and based upon a tag associated with the data.

As explained above, MacInnis does not disclose a router that routes data to different output ports based on configuration data. Further, as explained above, MacInnis does not disclose a router that routes data to different data ports based on a tag associated with the data. Accordingly, MacInnis fails to disclose each and every element of claim 24.

Claims 25-32 and 34 depend from claim 24. Accordingly, MacInnis fails to disclose or suggest each and every element of these claims, at least by virtue of their dependency on claim 24. Moreover, these claims recite additional non-obvious features.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 1-6, 8, 10-21, 23-32, and 34 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Anticipation Rejection of Claims 35-41

At page 5 of the Office Action, claims 35-41 were rejected under 35 U.S.C. Section 102(e) as being anticipated by Artieri (U.S. Patent No. 6,104,751). This rejection is hereby respectfully traversed.

Claim 35 recites "receiving a first client request from a first video decoder." This element is not disclosed or suggested by Artieri. The Office Action states that this element is disclosed by Artieri in FIG. 3. *Office Action*, p. 9. Specifically the Office Action argues that the requests RQ provided by the FIFO 20 are client requests received by a video decoder. *Id.* However, the requests RQ are provided by a FIFO 20, not by a video decoder. *See* Artieri, FIG. 3. Moreover, the FIFO 20 is itself a part of a video decoder, as illustrated in FIG. 8 of Artieri. In particular, Artieri states that "FIG. 8 represents four MPEG decoders connected so as to process the four slices of the high definition picture." Artieri, col. 20, lines 14-15. Further, as illustrated

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in FIG. 8, each of the MPEG decoders receives the input signal "CDin." As illustrated in FIG. 3, this is the input signal received by the FIFO 20 that generates the requests RQ. Accordingly, the requests RQ are not *received from* one of the MPEG decoders, but are generated *internal to* one of the MPEG decoders. Therefore, Artieri does not disclose or suggest receiving a first client request from a video decoder. Thus, Artieri fails to disclose each and every element of claim 35.

Claims 36-41 depend from claim 35. Accordingly, Artieri fails to disclose or suggest each and every element of these claims, at least by virtue of their dependency on claim 35. Moreover, these claims recite additional non-obvious features.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 35-41 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Obviousness Rejection of Claims 7 and 9

At page 6 of the Office Action, claims 7 and 9 were rejected under 35 U.S.C. Section 103(a) as being unpatentable over MacInnis in view of Kilgariff (U.S. Patent No. 5,999,183). This rejection is hereby respectfully traversed.

Claims 7 and 9 depend from claim 1. As set forth above, MacInnis does not disclose or suggest each and every element of claim 1. Moreover, Kilgariff does not disclose or suggest those elements lacking in MacInnis. Accordingly, MacInnis and Kilgariff, individually and in combination, fail to disclose each and every element of claims 7 and 9, at least by virtue of their dependency on claim 1.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 7 and 9 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Obviousness Rejection of Claims 22 and 33

At page 8 of the Office Action, claims 22 and 33 were rejected under 35 U.S.C. Section 103(a) as being unpatentable over MacInnis in view of Foster (U.S. Patent No. 6,240,492). This rejection is hereby respectfully traversed.

Claim 22 depends from claim 1. As set forth above, MacInnis does not disclose or suggest each and every element of claim 1. Moreover, Foster does not disclose or suggest those elements lacking in MacInnis. Accordingly, MacInnis and Foster, individually and in

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combination, fail to disclose each and every element of claim 22, at least by virtue of its dependency on claim 1.

Claim 33 depends from claim 24. As set forth above, MacInnis does not disclose or suggest each and every element of claim 1. Moreover, Foster does not disclose or suggest those elements lacking in MacInnis. Accordingly, MacInnis and Foster, individually and in combination, fail to disclose each and every element of claim 33, at least by virtue of its dependency on claim 24.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 22 and 33 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.


Conclusion

The Applicants respectfully submit that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-0441.

Respectfully submitted,

10/25/15
Date


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